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May 27, 1997

SENT VIA FIRST CLASS MAIL

J. P. Andre, Report Analyst
Federal Election Commission
999 E Street, N.W., Room 709
Washington, D.C. 20463

RE: Local 3, United Storeworkers, RWDSU, AFL-CIO, and Carolyn Maloney

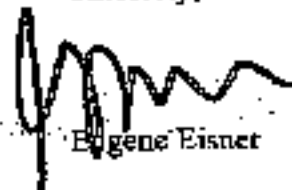
Dear Mr. Andre:

This letter is being written in response to your recent letter to the Treasurer of Local 3, RWDSU concerning an in-kind donation to the Carolyn Maloney for Congress Committee. Your letter indicated that Local 3's in-kind donation of space valued at \$5000 may constitute an "excessive contribution to a federal candidate for the 1996 election."

After investigating this matter, I have learned that Local 3 complied with the requirements of the Federal Election Campaign Act. During the Maloney campaign, Local 3 was directed by its parent union, the Retail Wholesale and Department Store Union (R.W.D.S.U.), to make space available to the Maloney campaign. After the campaign ended, R.W.D.S.U. received a check for \$5000 from the Maloney campaign as reimbursement for this in-kind donation. As a result, there was no violation of the Act because R.W.D.S.U. "receive[d] a full contribution refund" as cited in your letter. I have attached a memorandum from R.W.D.S.U.'s Comptroller in order to document their receipt of a \$5000 refund from Rep. Maloney.

This letter and documentation should resolve this matter. If you have any questions, please do not hesitate to call me.

Sincerely,



Eugene Eisner

cc: Ms. Ida Torres, Secretary-Treasurer, Local 3
Mr. Stuart Applebaum, Secretary-Treasurer, R.W.D.S.U.

PARA:LETTER/LOCAL3/ANDRE05.14

LENORE MILLER *President*STUART APPELBAUM *Secretary-Treasurer*

RETAIL, WHOLESALE AND DEPARTMENT STORE UNION • 30 E. 38TH ST., NEW YORK, N.Y. 10018 • (212) 694-

MEMORANDUM

TO: Stuart Appelbaum

FROM: Tom Carlton

DATE: May 14, 1997

RE: PAYMENT BY CAROLYN MALONEY FOR CONGRESS FOR
USE OF OFFICE SPACE

Per your request, I'd like to inform you that we received a check dated May 2, 1997 from the Carolyn Maloney for Congress Committee for \$5,000. This check represents payment for the use of office space provided by the RWDSU through RWDSU Local 3 at 1010 Third Avenue in New York during the 1996 election campaign.

If you have any questions, please contact me.

c Lenore Miller
John O'Neill
Ida Torres

Affiliated with American Federation of Labor-Congress of Industrial Organizations and Canadian Labour Congress

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

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PREPARER

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